

EXHIBIT 4

From: McGonagle, Dan
Sent: Tuesday, April 27, 2021 12:30 PM
To: Christopher S. Sun; Seeve, Brian; Gannon, Kevin
Cc: wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com; kvpsingular@keker.com; Singular
Subject: RE: Singular v. Google - Meet and Confer re: Singular's Interrogatory Responses

Dear Chris,

We intend on supplementing our response to both interrogatory Nos. 16 and 18 consistent with our conversation last week. We hope to have updated interrogatory responses by next week.

On the call last week, you also promised that you would be producing the re-imaged documents referenced in our April 6th correspondence by last Friday. We have not received that production. If you do not intend to produce said documents by the end of the day, please explain why.

Additionally, please let us know by today if you are taking the position that the documents referenced in our letter are not responsive to Plaintiff's First Set of Requests for Production. If so, please indicate which specific documents referenced in our correspondence you are claiming are not responsive.

Thanks
Dan McGonagle



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From: Christopher S. Sun [mailto:csun@keker.com]
Sent: Thursday, April 22, 2021 4:15 PM
To: Seeve, Brian <bseeve@princelobel.com>; Gannon, Kevin <kgannon@princelobel.com>
Cc: wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com; kvpsingular@keker.com; Singular <Singular@princelobel.com>
Subject: Singular v. Google - Meet and Confer re: Singular's Interrogatory Responses

Counsel,

On our meet and confer last week, you said that you would look into producing the S1 tests you refer to in response to Google's Interrogatory No. 15, which are responsive to Google's RFP Nos. 16 and 65. Please let us know the status of your investigation.

On Interrogatory No. 16, related to the S2, you said both that the S2 does not exist and that it is not relevant. As we explained with respect to relevance, we disagree that a subsequent iteration of Singular's practicing product and an attempt to commercialize the claimed invention is irrelevant. If the S2 does not exist, that information is responsive to the Interrogatory and Singular should supplement its response to explain. And if Singular contends that information about the S2 is irrelevant because it does not practice the asserted patents, Singular should supplement its response to say so. Please let us know whether and when you will supplement your response to interrogatory No. 16.

On interrogatory No. 18, you said you would supplement your response to answer the interrogatory including the portion that asks about the testing code underlying your Infringement Contentions. What is the status of that supplement?

Sincerely,

Chris

Christopher S. Sun

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